

**Subject:** Andrews v. Tri Star Discovery  
**Date:** Tuesday, February 8, 2022 at 11:36:13 AM Central Standard Time  
**From:** Betsy Hart  
**To:** Daniel Arciniegas  
**CC:** Roland Mumford, Tara Swafford  
**Attachments:** image001.jpg, Tri Star .MSG Emails Reproduced as PDFs.pdf, Tri Star Proposed Protective Order .docx

Daniel,

The .msg documents that were previously produced have been converted to PDFs. Those are attached with new bates numbers.

We still have not received your client's subsequent wage and income information that you indicated would be produced by January 28. What is the status of that?

I have attached a revised proposed protective order that does not include a highly confidential designation since, at this time, we do not plan to produce any documents that would fall into that category. By entering into the attached protective order, Tri Star is not waiving its right to move for a new or amended protective order that would include a highly confidential designation in the event it becomes necessary to produce documents that should be designated at highly confidential and warrant greater protection. The proposed order includes your requested changes that counsel can retain copies of all documents for a year after appeal deadlines, and that the designating party is the one that should move for protection if there's a dispute. Please let me know if you can agree to this version of the protective order, with the understanding that Tri Star retains its right to move for a new or amended order down the road if necessary, so that we can keep discovery moving.

Please give me or Tara a call if you would like to discuss. Thanks.



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